

FILED
9/30/2021

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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CHARLES LIGGINS, a/k/a "C Murda,"
KENNETH ROBERSON, a/k/a "Kenny"
and "Kenny Mac,"
TACARLOS OFFERD, a/k/a "Los,"
CHRISTOPHER THOMAS, a/k/a
"C Thang," and
MARCUS SMART, a/k/a "Muwop"

UNDER SEAL **1:21-CR-00618**

Violations: Title 18, United States Code,
Sections 1959(a)(1), 1959(a)(3), 1959
(a)(5), 924(c)(1)(A), 924(j)(1), and 2

JUDGE PACOLD
MAGISTRATE JUDGE GILBERT

COUNT ONE

The SPECIAL JANUARY 2020 GRAND JURY charges:

At times material to this Indictment:

1. The defendants, and others known and unknown, were members and associates of the O-Block street gang, a criminal organization whose members and associates engaged in acts of violence, including but not limited to acts involving murder and assault, and which operated on the South Side of Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere.

2. The O-Block street gang, including its leadership, membership, and associates, constituted an "enterprise," as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which engaged in, and the activities of which affected, interstate and foreign commerce.

3. The O-Block enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

4. The purposes of the enterprise included, but were not limited to, the following:

a. Acquiring, preserving, and protecting power, territory, operations, and proceeds for the enterprise through the use of threats, intimidation, and violence, including, but not limited to, murder and other acts of violence, and the illegal trafficking in controlled substances;

b. Promoting and enhancing the enterprise and its members' and associates' activities, including by publicly claiming responsibility for acts of violence committed by the enterprise and taunting rival gang members;

c. Increasing the status of the enterprise through the use of social media platforms and music; and

d. Taking steps designed to prevent law enforcement's detection of the enterprise's criminal activities.

5. At times relevant to this Indictment, O-Block, through its leadership, membership, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely:

a. Acts involving murder, in violation of the laws of the State of Illinois; and

b. Offenses involving narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846.

6. On or about August 4, 2020, at Chicago, in the Northern District of Illinois, Eastern Division,

CHARLES LIGGINS, a/k/a "C Murda,"
KENNETH ROBERSON, a/k/a "Kenny" and "Kenny Mac,"
TACARLOS OFFERD, a/k/a "Los,"
CHRISTOPHER THOMAS, a/k/a "C Thang," and
MARCUS SMART, a/k/a "Muwop,"

defendants herein, for the purpose of maintaining and increasing position in O-Block, an enterprise engaged in racketeering activity, did knowingly commit the murder of Carlton Weekly, a/k/a "FBG Duck," in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/9-1(a), 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Section 1959(a)(1) and 2.

COUNT TWO

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 4, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

CHARLES LIGGINS, a/k/a “C Murda,”
KENNETH ROBERSON, a/k/a “Kenny” and “Kenny Mac,”
TACARLOS OFFERD, a/k/a “Los,”
CHRISTOPHER THOMAS, a/k/a “C Thang,” and
MARCUS SMART, a/k/a “Muwop,”

defendants herein, knowingly used, carried, brandished, and discharged a firearm, during and in relation to a crime of violence for which defendants may be prosecuted in a court of the United States, namely the murder of Carlton Weekly, a/k/a “FBG Duck,” in violation of Title 18, United States Code, Section 1959(a)(1), as charged in Count One of this Indictment; and in the course of committing such offense, in violation of Title 18, United States Code, Section 924(c), CHARLES LIGGINS, a/k/a “C Murda,” KENNETH ROBERSON, a/k/a “Kenny” and “Kenny Mac,” TACARLOS OFFERD, a/k/a “Los,” CHRISTOPHER THOMAS, a/k/a “C Thang,” and MARCUS SMART, a/k/a “Muwop,” defendants herein, did cause the death of Carlton Weekly through the use of such firearm, which killing was murder as defined in Title 18, United States Code, Section 1111(a);

In violation of Title 18, United States Code, Section 924(j)(1).

COUNT THREE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

1. Paragraphs 1 through 5 of Count One are realleged here.
2. On or about August 4, 2020, at Chicago, in the Northern District of Illinois, Eastern Division,

CHARLES LIGGINS, a/k/a “C Murda,”
KENNETH ROBERSON, a/k/a “Kenny” and “Kenny Mac,”
TACARLOS OFFERD, a/k/a “Los,”
CHRISTOPHER THOMAS, a/k/a “C Thang,” and
MARCUS SMART, a/k/a “Muwop,”

defendants herein, for the purpose of maintaining and increasing position in O-Block, an enterprise engaged in racketeering activity, did knowingly conspire to murder Carlton Weekly, a/k/a “FBG Duck,” in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/8-2(a) and (c)(3) and 5/9-1(a);

In violation of Title 18, United States Code, Section 1959(a)(5).

COUNT FOUR

The SPECIAL JANUARY 2020 GRAND JURY further charges:

1. Paragraphs 1 through 5 of Count One are realleged here.
2. On or about August 4, 2020, at Chicago, in the Northern District of Illinois, Eastern Division,

CHARLES LIGGINS, a/k/a "C Murda,"
KENNETH ROBERSON, a/k/a "Kenny" and "Kenny Mac,"
TACARLOS OFFERD, a/k/a "Los,"
CHRISTOPHER THOMAS, a/k/a "C Thang," and
MARCUS SMART, a/k/a "Muwop,"

defendants herein, for the purpose of maintaining and increasing position in O-Block, an enterprise engaged in racketeering activity, did knowingly commit assault with a dangerous weapon upon an individual, namely Victim 1, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/12-2(c), 5/12-3.05(e)(1), 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Section 1959(a)(3) and 2.

COUNT FIVE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 4, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

CHARLES LIGGINS, a/k/a "C Murda,"
KENNETH ROBERSON, a/k/a "Kenny" and "Kenny Mac,"
TACARLOS OFFERD, a/k/a "Los,"
CHRISTOPHER THOMAS, a/k/a "C Thang," and
MARCUS SMART, a/k/a "Muwop,"

defendants herein, knowingly used, carried, brandished, and discharged a firearm,
during and in relation to a crime of violence for which defendants may be prosecuted
in a court of the United States, namely an assault with a dangerous weapon upon an
individual, in violation of Title 18, United States Code, Section 1959(a)(3), as charged
in Count Four of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT SIX

The SPECIAL JANUARY 2020 GRAND JURY further charges:

1. Paragraphs 1 through 5 of Count One are realleged here.
2. On or about August 4, 2020, at Chicago, in the Northern District of Illinois, Eastern Division,

CHARLES LIGGINS, a/k/a "C Murda,"
KENNETH ROBERSON, a/k/a "Kenny" and "Kenny Mac,"
TACARLOS OFFERD, a/k/a "Los,"
CHRISTOPHER THOMAS, a/k/a "C Thang," and
MARCUS SMART, a/k/a "Muwop,"

defendants herein, for the purpose of maintaining and increasing position in O-Block, an enterprise engaged in racketeering activity, did knowingly commit assault with a dangerous weapon upon an individual, namely Victim 2, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/12-2(c), 5/12-3.05(e)(1), 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Section 1959(a)(3) and 2.

COUNT SEVEN

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 4, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

CHARLES LIGGINS, a/k/a "C Murda,"
KENNETH ROBERSON, a/k/a "Kenny" and "Kenny Mac,"
TACARLOS OFFERD, a/k/a "Los,"
CHRISTOPHER THOMAS, a/k/a "C Thang," and
MARCUS SMART, a/k/a "Muwop,"

defendants herein, knowingly used, carried, brandished, and discharged a firearm,
during and in relation to a crime of violence for which defendants may be prosecuted
in a court of the United States, namely an assault with a dangerous weapon upon an
individual, in violation of Title 18, United States Code, Section 1959(a)(5), as charged
in Count Six of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

NOTICE OF SPECIAL FINDINGS

1. The allegations set forth in Count One are incorporated here.
2. The defendants CHARLES LIGGINS, KENNETH ROBERSON, TACARLOS OFFERD, CHRISTOPHER THOMAS, and MARCUS SMART:
 - a. Were eighteen years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a)(2));
 - b. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
 - c. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
 - d. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (Title 18, United States Code, Section 3592(c)(5)); and

e. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY